

Matthew Cunanan, WSBA #42530  
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**Hon. Jamal N. Whitehead**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

VALVE CORPORATION, Plaintiff,

V.

Plaintiff,

Case No. 2:23-cv-01016-JNW

LEIGH ROTHSCHILD, ROTHSCHILD  
BROADCAST DISTRIBUTION SYSTEMS, LLC,  
DISPLAY TECHNOLOGIES, LLC, PATENT  
ASSET MANAGEMENT, LLC, MEYLER  
LEGAL, PLLC. AND SAMUEL MEYLER.

DECLARATION OF MATTHEW  
CUNANAN

## Defendants.

I, Matthew Cunanan, declare the following:

1. My name is Matthew Cunanan. I am local counsel for defendants in the above referenced case. I am competent to testify as to the matters set forth in this declaration and I make this declaration based upon my own personal knowledge.

2. On September 18, 2023, I was engaged by defendants for the limited purpose of serving as local counsel in this matter.

3. I have not acted as lead counsel or participated in any of the decision-making process for this litigation, as all decisions have been made exclusively by Don McPhail and his law firm

4. Since engagement, I have only been paid a flat rate of \$500.00 in this matter.

5. In the interest of preserving client confidences and respecting the attorney-client privilege, I have not attached to this Declaration communications and documents relating to relationship between Defendants, lead counsel and myself.

6. If the Court believes review of these materials would be helpful, I can provide them for in camera review.

7. As such, I still intend to file for withdrawal in the event that lead counsel Don McPhail & Merchant Gould's Motion for Leave to Withdraw as Counsel for Defendants is granted.

DATED: June 2, 2025 at Burien, WA.

s/ Matthew Cunanan

Matthew Cunanan, WSBA #42530  
Attorney for Defendants *Leigh Rothschild, Rothschild Broadcast Distribution Systems, LLC, Display Technologies, LLC, Patent Asset Management, LLC, Meyler Legal, PLLC & Samuel Meyler*  
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